

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244

DECLARATION OF WILLIAM
MCGINTY IN SUPPORT OF
PLAINTIFF'S EMERGENCY
MOTION FOR TEMPORARY
RESTRAINING ORDER

NOTE ON MOTION CALENDAR:
FEBRUARY 7, 2025

I, William McGinty, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge. I am one of the attorneys representing Plaintiff State of Washington in the above-captioned matter.

2. The Plaintiffs in this matter filed this lawsuit today, February 7, 2025, and filed their Emergency Motion for a Temporary Restraining Order concurrently herewith. The Motion seeks a Temporary Restraining Order to enjoin the President's Executive Order 14,187 of January 28, 2025, entitled "Protecting Children From Chemical and Surgical Mutilation."

3. Pursuant to Federal Rule of Civil Procedure 65(b) and Western District of Washington LCR 65(b)(1), counsel for Plaintiffs emailed the office of the United States Attorney for the Western District of Washington in advance of filing at 6:28 a.m. and 7:27 a.m. on

February 7, 2025, to notify the office of the Plaintiffs' intention to file the Complaint and Motion for a Temporary Restraining Order today, and to note it for same-day hearing once filed. At 6:43 a.m. on February 7, 2025, Plaintiffs' counsel received an email confirming receipt from the Chief of the Civil Division for the U.S. Attorney's Office for the Western District of Washington. At 9:00 a.m., the Civil Chief let the Plaintiffs know that Vinita Andrapalliyal and Christian Daniel with the Civil Division's Federal Programs Branch would be the Plaintiffs' contact for the case, and the Plaintiffs committed to send copies of the motion for Temporary Restraining Order and all supporting papers electronically once filed.

4. Attached as Exhibit 1 is a true and correct copy of Executive Order 14,187 as published in the federal register.

5. Attached as Exhibit 2 is a true and correct copy of Executive Order 14,168 as published in the federal register.

6. Attached as Exhibit 3 is a true and correct copy of Executive Order 14,183 as published in the federal register.

7. Attached as Exhibit 4 is a true and correct copy of the Temporary Restraining Order issued in *New York v. Trump*, C.A. No. 1:25-cv-00039-JJM-PAS (D.R.I. Jan. 31, 2025).

8. Attached as Exhibit 5 is a true and correct copy of a notice filed by the Department of Justice in *New York v. Trump*, C.A. No. 1:25-cv-00039-JJM-PAS on February 3, 2025, titled "Defendant's Notice of Compliance with Court's Temporary Restraining Order."

9. Attached as Exhibit 6 is a true and correct copy of a memorandum titled "Memorandum for Heads of Executive Departments and Agencies" from Acting Director of the Office of Management and Budget Matthew J. Vaeth dated January 27, 2025.

10. Attached as Exhibit 7 is a true and correct copy of a memorandum titled "Initial Guidance Regarding President Trump's Executive Order *Defending Women*" from Acting Director of the U.S. Office of Personnel Management dated January 29, 2025.

11. Attached as Exhibit 8 is a true and correct copy of a news article published by AP News on January 30, 2025, written by Carla K. Johnson, Devna Bose, and Laura Bargfeld titled “Some hospitals pause gender-affirming care to evaluate Trump’s executive order.” I accessed this article online at the URL, <https://apnews.com/article/transgender-trump-executive-order-hormones-hospitals-8d9e6b94b34d2e6f890c06ebba0fe1d> on February 3, 2025 and used the print feature on the website to save a PDF copy using a print to PDF function.

12. Attached as Exhibit 9 is a true and correct copy of a press release issued by the White House on February 3, 2025, titled “President Trump is Delivering on His Commitment to Protect our Kids.”

13. Attached as Exhibit 10 is a true and correct copy of an article published by the LA Times, written by Emily Albert Reyes titled “Children’s Hospital L.A. Stops Initiating Hormonal Therapy for Transgender Patients Under 19”. I accessed this article online at the URL, <https://www.latimes.com/california/story/2025-02-04/childrens-hospital-to-stop-initiating-hormonal-therapy-for-trans-patients-under-19> on February 5, 2025, and used the print feature on the website to save a PDF copy using a print to PDF function.

14. Attached as Exhibit 11 is a true and correct copy of posts made by Karoline Leavitt to the social media platform X publicizing health care providers ending the provision of gender affirming care.

15. Attached as Exhibit 12 is a true and correct copy of an article published in the New York Times written by Joesph Goldstein titled “N.Y. Hospital Stops Treating 2 Children After Trump’s Trans Care Order” and published on February 1, 2025. I accessed this article online at the URL, <https://www.nytimes.com/202502/01/nyregion/nyu-langone-hospital-trans-care-youth.html> on February 5, 2025 and used the print feature on the website to save a PDF copy using a print to PDF function.

